

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-CF-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida, and travel to Foxwood Resort, Foxwood, Connecticut, and for grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a fifty thousand dollar corporate surety and a fifty thousand dollar personal surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That as of July 30, 2001 the Defendant has entered a plea of guilty to Count 6 of the instant Indictment.
5. That the Defendant respectfully requests this Honorable Court permit him to travel to Foxwood, Connecticut for the purpose of visiting with his children for the Labor Day holiday and to explain to his children his situation and up-coming sentencing.
6. That the Defendant desires to travel outside of the State of Florida for approximately Three (3) days beginning on or about September 1, 2001 and returning September 3, 2001.
7. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit

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8. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.

9. That prior to the Defendant's departure the Defendant will provide addresses and telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to Foxwood, Connecticut.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and he states that he strongly opposes the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 24 AUGUST, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
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By: 

DONALD R. SPADARO, ESQUIRE
Florida Bar No.: 320341

Dear VIP:

Thank you for joining us at Foxwoods Resort Casino. The following information is to help make your trip on Saturday, September 1st, 2001 to Monday, September 3rd, 2001 as easy as possible.

- **PLEASE CALL TO CONFIRM YOUR RESERVATION IMMEDIATELY** in order to accommodate your specific requests and/or needs.

- Departure Information:

Saturday, September 1st from Ft. Lauderdale International Airport Terminal 4 at the JET CENTER COUNTER. Our charter departs at 10:00am and arrives in Providence, RI at 12:45pm

You must be at the airport **NO LATER** than 8:45am to check-in. Please make sure that the name of the person to whom the room is registered is clearly written on the enclosed luggage tags. Your luggage will be handled at the airport and delivered to Foxwoods.

- Hotel Check-In Information: Upon arrival at the hotel, **you must post a credit card** or leave a cash deposit in order to charge incidentals to the room (phone calls, food, movies, room service, etc.). Your luggage will be delivered to your room after you arrive at the hotel.
- Hotel Departure: Please have your bags packed and inside your room for the bellman pick-up by 11:00am. You will meet the group in the lobby of the Pequot Tower **NO LATER** than 1:45pm on Monday for departure to the airport.

Your flight is scheduled to depart Providence at 4:00pm
and arrive in Ft. Lauderdale at 7:00pm

- You will be issued a Wampum card and your casino package at the airport. Use your Wampum card at all times in the casino as well as buying in for cash, requesting a marker, or changing tables. Please insert your card at all times while playing slot machines and make sure the machine says "accepted."

Have a great trip. Good Luck!

Cordially

Bobby

*****Bobby Crisonino will be your tour leader. I will be at the JET CENTER counter at Terminal 4 to check-in your bags & pass out your boarding passes and casino packages.**